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CAUSE NO. 96-G0201

**HERCULES MARINE SERVICES
CORPORATION
PLAINTIFF**

VS.

**BOB CASALE
DEFENDANT**

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IN THE DISTRICT COURT

239TH JUDICIAL DISTRICT OF

BRAZORIA COUNTY, TEXAS

**NOTICE OF INTENTION TO TAKE
DEPOSITION BY WRITTEN QUESTIONS**

To: Hercules Marine Services Corporation/Plaintiff by and through their attorney(s) of record,
Mr. William Bruce Stanfill

ADDITIONAL ATTORNEYS LISTED ON CERTIFICATE OF SERVICE

You will take notice that, pursuant to Rule 208 and 201, Texas Rules of Civil Procedure, a Subpoena Duces Tecum will be issued and Deposition by Written Questions will be taken of the custodian of Investigation Records for:

**Texas Natural Resource Conservation Commission
5425 Polk Ave. Suite H
Houston, Texas 77023-1423**

Notice is further given that on or after ten (10) days following the service of a copy hereof with attached questions, the witness shall be commanded to produce documents, as requested in the subpoena duces tecum. The said written deposition with attached exhibits may be used in evidence upon the trial of the above-styled and numbered cause pending in the above-named court. Said witness is to produce the following:

any and all Investigation Records, notes, reports, files, papers, documents, memorandum, transcripts, recordings, data, correspondence, and any other tangible documents in the possession, custody or control of said witness, related to the investigation of: Hercules Marine Services Corporation, and any other related entity.

Said witness is to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to the said deposition and returned to a representative of EDR Records Services, Inc., 2437 Bay Area Blvd., Ste. 228, Houston, Texas 77058.

CERTIFICATE OF SERVICE

Cause No. 96-G0201

I hereby certify that a true and correct copy of the foregoing Notice of Intention to Take
Deposition upon Written Questions was delivered to the respective parties and/or attorneys of record
by certified mail return receipt requested, hand delivered, and/or tele-faxed.

Date: April 17, 1998

By: Elida L. Salazar
For: Mr. William J. Eggleston
Taylor & Eggleston
State Bar No. 06483500
Attorney for: Bob Casale
Defendant

Mr. William Bruce Stanfill
Beirne, Maynard & Persons, L.L.P.
1300 Post Oak Blvd., Suite 2500
Houston, Texas 77058-3000
Attorney For: Hercules Marine Services Corporation
Plaintiff